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November 16, 2021

Via ECF

Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

***Re: HC2, Inc. v. Andrew Delaney
Civil Action No. 20-cv-03178-LJL***

Dear Judge Liman:

On behalf of HC2, Inc., we respectfully submit this letter as directed by the Court's November 12, 2021 Order to provide an update on Mr. Delaney's bankruptcy case in 1-20-44372-jmm and the automatic stay.

The Bankruptcy Court has not entered any further orders bearing on the instant matter since its October 6, 2021 order approving the settlement between HC2, Inc. and Gregory Messer, Esq. On October 6, 2021, the Bankruptcy Court terminated Christopher Beres as counsel for Mr. Delaney and, on October 14, 2021, the Bankruptcy Court also closed a motion to dismiss that Mr. Delaney had previously filed. The Bankruptcy Court also closed HC2's adversary case, on October 21, 2021. Mr. Delaney recently filed amended schedules, on November 5, 2021.

The Bankruptcy Court has not issued a discharge and the automatic stay remains fully in effect.

We thank the Court for its time and attention to this matter.

Respectfully Submitted,

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.

s/ Michael Nacchio

Michael Nacchio

A South Carolina Professional Corporation ■ Peter O. Hughes ■ New Jersey Managing Shareholder

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Honorable Lewis J. Liman, U.S.D.J.
HC2 Inc. v. Delaney, No. 20-cv-03178-LJL
November 16, 2021

cc:

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